

## KIMM LAW FIRM

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October 30, 2014

By ECF

Hon. Nelson S. Roman, USDJ  
United States District Court  
Southern District of New York  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: Bae et al v. Garvey; 14-cv-06001(NSR)

Dear Judge Roman:

In anticipation of the initial pretrial conference scheduled for tomorrow at 10:45 AM, the parties have discussed and agreed to the following joint discovery plan, which we now present for the Court's endorsement.

Deadline for Rule 26(a) Disclosures: The deadline for all Rule 26(a) disclosures shall be one (1) month from this date, **November 30, 2014**.

Deadline for Completion of Fact Discovery: The deadline for completing all fact discovery shall be seven (7) months from this date, **May 30, 2015**.

a. The deadline for service of document demands and interrogatories shall be two (2) months from this date, **December 30, 2014**.

b. The deadline for party depositions shall be the same as the fact discovery deadline, **May 30, 2015**.

Deadline for Disclosure of Experts and Completion of Expert Discovery:

a. The deadline for Plaintiff to provide full and complete expert disclosures and available deposition dates shall be nine (9) months from this date, **July 30, 2015**.

b. The deadline for completing all expert discovery and depositions shall be eleven (11) months from this date, **September 30, 2015**.

Deadline for Filing Dispositive Motions: The deadline for filing all dispositive motions shall be thirteen (13) months from this date, **November 30, 2015**.

Case Management Conference: A case management/status conference shall be a date determined by the Court.

Any discovery issue is to be presented to the Magistrate Judge by letter. No formal motion should be filed without leave.

Thank you for your consideration.

Respectfully submitted,

/s/ Michael S. Kimm

Michael S. Kimm  
Thomas W. Park

MSK/py  
cc: Daniel J. McNamara, Esq. (By ECF)